

**THE COMMENT'S OF EXPAND NETWORK, INC. ON THE RURAL BROADBAND  
STRATEGY GN Docket No. 09-29 (DA 09-561)**

Expand Networks, Inc. respectfully submits the following comment pursuant to Section 6112 1.C. of the 2008 Farm Bill.

Rural broadband programs should include Wide Area Network (WAN) Optimization technologies to serve the public interest by ensuring the most efficient use of tax-payer dollars

To serve the public interest and facilitate the rapid build-out of rural broadband capacity, the government should encourage the use of WAN Optimization information technology products and solutions which deliver maximum taxpayer value – as measured by bandwidth efficiency and application performance.

Interoperable WAN Optimization technologies already are in widespread government and commercial use and should be an integral component of the nation's rural broadband infrastructure. The benefits of WAN Optimization technologies are especially pronounced for the delivery of rural broadband over satellite, cellular and other bandwidth constrained networks.

WAN Optimization technologies increase the virtual bandwidth of all networks, increase the value of network investment, lower network operating and recurring costs, while simultaneously enabling greater network access and usage with faster application performance capable of supporting e.g., telehealth and distance learning applications.